

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN)

Burlingame v. Bin Laden, et al., 02-cv-7230 (GBD)(SN)

Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(SN)

Schneider et al. v. Islamic Republic of Iran, 02-cv-7209 (GBD)(SN)

**ASHTON PLAINTIFFS' NOTICE OF MOTION
TO ADD ADDITIONAL PLAINTIFFS TO ITS
SIXTH AMENDED COMPLAINT AGAINST THE TALIBAN**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declaration of Andrew J. Maloney ("Maloney Declaration"), along with the exhibits attached thereto, the *Ashton* Plaintiffs, by and through their counsel, respectfully move that this Court:

1. Order that the *Ashton* Sixth Amended Complaint is deemed amended to add Additional Plaintiffs listed on Exhibits A, B, C and D to the Maloney Declaration as plaintiffs against the Taliban;
2. Order that the addition of the Additional Plaintiffs supplements by incorporation into, but does not displace, the underlying operative *Ashton* Sixth Amended Complaint;
3. Order that prior service, orders, and judgments entered in the case remain in effect as to all parties, including the default judgment obtained by the *Ashton* Plaintiffs against the Defendant Taliban entered on May 12, 2006 at ECF 1797;
4. Order that all Additional Plaintiffs are bound by all prior rulings made in this case, including the Court's prior order on service by publication, ECF 445;
5. Order that Case Management Order #2, ECF 247, ¶12 applies to the Additional

Plaintiffs listed on Exhibits A, B, C and D to the Maloney Declaration such that re-service of the Taliban is not required;

6. Order that upon granting the *Ashton* Plaintiffs' motion, the names of the Additional Plaintiffs included on Exhibits A, B, C and D to the Maloney Declaration shall be entered in the Court's CM/ECF system; and
7. Granting such other and further relief that the Court deems just and proper.

Dated: November 4, 2022

Respectfully submitted,

/s/
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